

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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|-----------------------------------------------------------------------------------------------------------|-------------------------------|
| In re | Chapter 7 |
| AKORN HOLDING COMPANY LLC, et al., ¹ | Case No. 23-10253 (KBO) |
| Debtors. | (Jointly Administered) |
| GEORGE L. MILLER, Chapter 7 Trustee of the bankruptcy estates of Akorn Holding Company LLC, et al., | |
| Plaintiff, | Adv. Proc. No. 25-50338 (KBO) |
| v. | |
| HENDERSON CONSTRUCTORS, INC., | Re: Adv. D.I. 1, 6, 17 & __ |
| Defendant. | |

**ORDER APPROVING STIPULATION TO EXTEND DEADLINES
SET FORTH IN PROCEDURES ORDER**

The Court having considered the *Stipulation to Extend Deadlines Set Forth in the Procedures Order* (the “**Stipulation**”)², it is HEREBY ORDERED THAT:

1. The Stipulation attached hereto as **Exhibit 1** is approved.
2. Defendant’s deadline to answer or otherwise respond to the Complaint is extended through and including December 19, 2025.

¹ The Debtors in these chapter 7 cases, along with the last four digits of their federal tax identification numbers, and cases numbers are Akorn Holding Company LLC (9190), Case No. 23-10253 (KBO); Akorn Intermediate Company LLC (6123), Case No. 23-10254 (KBO); and Akorn Operating Company LLC (6184), Case No. 23-10255 (KBO). The Debtors’ headquarters is located at 5605 CenterPoint Court, Gurnee, IL 60031.

² Capitalized terms used but not defined herein are defined in the Stipulation.

3. This Court retains jurisdiction to hear and determine all matters related to the implementation of this Order.

EXHIBIT 1

Stipulation

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

| | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------|
| In re AKORN HOLDING COMPANY LLC, et al., ¹ Debtors. | Chapter 7 Case No. 23-10253 (KBO) (Jointly Administered) |
| GEORGE L. MILLER, Chapter 7 Trustee of the bankruptcy estates of Akorn Holding Company LLC, et al., Plaintiff, v. HENDERSON CONSTRUCTORS, INC., Defendant. | Adv. Proc. No. 25-50338 (KBO) Re: Adv. D.I. 1, 6, 17 & __ |

STIPULATION TO EXTEND DEADLINES SET FORTH IN PROCEDURES ORDER

Pursuant to Rule 7012-2 of the Local Rules for the United States Bankruptcy Court for the District of Delaware, counsel for George L. Miller, in his capacity as Chapter 7 Trustee of Akorn Holding Company LLC, Akorn Intermediate Company LLC, and Akorn Operating Company LLC, and as plaintiff (“Plaintiff”), and counsel for Henderson Constructors, Inc. (“Defendant”), hereby stipulate as follows:

1. Plaintiff filed its complaint against Defendant on February 19, 2025 [Adv. D.I. 1] (the “Complaint”).

¹ The Debtors in these chapter 7 cases, along with the last four digits of their federal tax identification numbers, and cases numbers are Akorn Holding Company LLC (9190), Case No. 23-10253 (KBO); Akorn Intermediate Company LLC (6123), Case No. 23-10254 (KBO); and Akorn Operating Company LLC (6184), Case No. 23-10255 (KBO). The Debtors’ headquarters is located at 5605 CenterPoint Court, Gurnee, IL 60031.

2. On June 11, 2025, the Court entered the *Order Establishing Streamlined Procedures Governing Adversary Proceedings with Total Amount in Controversy Greater Than \$75,000.00 Brought by Plaintiff Pursuant to Sections 502, 547, 548, and 550 of the Bankruptcy Code* [Adv. D.I. 6] (the “Procedures Order”).

3. The Procedures Order permits the Parties to extend deadlines three times without a court order. *See* Procedures Order ¶ 47. The Parties have stipulated to three extensions. *See* Adv. D.I. 13, 14 & 15.

4. Pursuant to the *Order Approving Stipulation To Extend Deadlines* [Adv. D.I. 17], the Defendant’s deadline to answer or otherwise respond to the Complaint was extended through and including November 21, 2025.

5. The Parties continue to engage in discussions to resolve this adversary proceeding, and have agreed to extend Defendant’s deadline to answer or otherwise respond to the Complaint through and including December 19, 2025. The Parties have further agreed that the discovery deadlines set forth in section E of the Procedures Order shall be extended as follows:

- a. If this adversary proceeding has not been resolved or settled on or before December 19, 2025, then this adversary proceeding shall be referred to mediation.
- b. In the event that this adversary proceeding is referred to mediation, Defendant shall choose a mediator from the list of proposed mediators attached as Exhibit 2 to the Procedures Order and notify Plaintiff’s counsel of the selected mediator in accordance with the Procedures Order no later than December 30, 2025.

c. Plaintiff will work with the selected mediator to schedule a mediation in accordance with the Procedures Order. The mediation must be concluded no later than January 20, 2026, subject to the mediator's availability.

6. Subject to the extensions set forth herein, the procedures set forth in the Procedures Order remain in full force and effect.

7. In the event that this adversary proceeding remains open following mediation, then the Parties shall enter into a further stipulation, as provided for in paragraph 47 of the Procedures Order, regarding the discovery deadlines set forth in paragraphs 6 through 22 of the Procedures Order.

Dated: December 2, 2025

SAUL EWING LLP

/s/ Paige N. Topper

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